



HARRIS, WILTSHIRE
& GRANNIS LLP

March 1, 2019

Via Electronic Delivery

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Suite TW-A325
Washington, DC 20554

Re: EB Dkt. No. 06-36, *2019 CPNI Compliance Certificate*

Dear Ms. Dortch

Attached for filing is Iotum Inc. and Iotum Global Holding, Inc.'s 2019 CPNI Compliance Certification and Statement as required by 47 C.F.R. § 64.2009(e).

Please direct any questions you have regarding this filing to the undersigned.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'J. Bagg'.

Jennifer P. Bagg
*Counsel to Iotum Inc. and
Iotum Global Holdings, Inc.*

**ANNUAL 47 C.F.R. § 64.2009(e) CPNI CERTIFICATION
OF IOTUM INC. AND IOTUM GLOBAL HOLDINGS, INC.
(EB Dkt. 06-36)**

Date filed: March 1, 2019

Name of company(s) covered by this certification: Iotum Global Holdings, Inc. and Iotum Inc.,
("the company" or "Iotum")

Form 499 Filer ID: 829755 and 830096

Name of signatory: Jason Martin

Title of signatory: CEO and President

Certification: I, Jason Martin, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



Jason Martin
CEO and President
Iotum Inc. and Iotum Global Holdings, Inc.

POLICY REGARDING CUSTOMER PROPRIETARY NETWORK INFORMATION

Iotum Global Holdings, Inc. and Iotum Inc. (“the company” or “Iotum”), does not use, disclose, or permit access to Customer Proprietary Network Information (“CPNI”) except as permitted under 47 U.S.C. § 222(d), or permitted by law in the Federal Communication Commissions’ (“FCC”) CPNI rules (47 C.F.R. § 64.2001, *et seq.*). This policy outlines Iotum’s procedures for using, accessing, and protecting customers’ CPNI.

Definition of CPNI: Iotum defines CPNI consistent with 47 C.F.R. § 64.2003.

Use of CPNI: Iotum only has limited access to CPNI in the form of call detail records. In order to protect its customers’ CPNI information, Iotum’s general policy is to not disclose CPNI. Iotum may disclose CPNI if a customer provides written, oral, or electronic permission to do so or if necessary to protect the rights or property of Iotum, or to protect users of Iotum’s services from fraudulent, abusive, or unlawful use or subscription to Iotum’s services. Iotum has also implemented network security measures to protect CPNI, including the use of encryption. Iotum has implemented password protection for telephone and online accounts and has procedures in place for lost or stolen passwords.

Employee Training and Disciplinary Policies: All Iotum employees with access to CPNI are trained on, and agree to comply with Iotum’s CPNI policy. Any employee who violates the policy and federal laws regarding CPNI is subject to disciplinary action by Iotum, including termination.

Use of CPNI in Marketing Campaigns: Iotum does not currently use CPNI to market outside of the category of service to which the customer subscribes. Iotum respects all opt-in and out-out marketing preferences established by the customer and maintains a record of such marketing communications preferences. A supervisor must approve any proposal to use CPNI to market Iotum products and services. Iotum maintains a record of this review process for at least one year, and maintains any marketing proposals, along with associated materials, for at least two years after their distribution.

FCC Notification: Consistent with FCC regulations, Iotum will provide written notice within five (5) days if its opt-out mechanisms do not work properly.

Third Party Use of CPNI: Iotum does not share CPNI with joint venture partners, third parties, or independent contractors for marketing purposes.

Law Enforcement Notification: Iotum will notify law enforcement within seven (7) days of the reasonable discovery of a CPNI data breach. Iotum will notify affected customers as permitted to do so by law, and maintain a record of the notifications. Iotum maintains a record of all unauthorized disclosures and notifications for two years.

Customer Complaints: Iotum tracks customer complaints it receives regarding CPNI. Iotum has not received any customer complaints regarding CPNI in the past year.

Actions Taken Against Pretexters: Iotum’s CPNI protection policy includes efforts to protect CPNI from pretexters. No actions have been taken against pretexters.